

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK MAIN OFFICE (SYRACUSE)**

RACHEL COLANGELO and
KATHLEEN PARADOWSKI,
individually and on behalf of a class of
similarly situated individuals,

Plaintiffs,

v.

CHAMPION PETFOODS USA INC.
and CHAMPION PETFOODS LP,

Defendants.

CIVIL ACTION NO.: 6:18-cv-01228-LEK-ML

**DECLARATION OF DAVID A. COULSON,
ESQ. IN SUPPORT OF DEFENDANTS'
MOTION TO EXCLUDE
PLAINTIFF'S EXPERT WITNESS
BRUCE G. SILVERMAN**

I, DAVID A. COULSON, pursuant to 28 U.S.C. § 1746(2), declare under penalty of perjury the following:

1. I am shareholder with the law firm of GREENBERG TRAURIG, P.A. I represent Defendants Champion Petfoods USA Inc. and Champion Petfoods LP (collectively, "Champion") and submit this declaration in support of Champion's Motion to Exclude Plaintiff's Expert Witness Bruce G. Silverman. This declaration is based on my personal knowledge and review of my files.

2. Attached as "**Exhibit 1**" is a true and correct copy of the Expert Report of Bruce G. Silverman dated February 24, 2021^[1] and served in this action.

3. Attached as "**Exhibit 2**" is a true and correct copy of the transcript from the deposition of Bruce G. Silverman taken on November 24, 2020 in the related case *Song v. Champion Petfoods*, Case No. 18-cv-03205-PJS-KMM (D. Minn). The plaintiffs in the *Song* case were represented by the same counsel as those here and advanced similar claims and theories as Plaintiff does here. There has been substantial overlap between those two cases. Accordingly,

Plaintiff and Champion stipulated that Mr. Silverman's deposition in *Song* would apply in this action as well.

4. Attached as "**Exhibit 3**" is a true and correct copy of the transcript from the deposition of Bruce G. Silverman taken on March 17, 2021 in this action.

5.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 15th day of April, 2021 in Miami, Florida.

s/ David A. Coulson
David A. Coulson